

**Before**

**U.S. CUSTOMS AND BORDER PROTECTION  
DEPARTMENT OF HOMELAND SECURITY**

**Washington, DC 20229**

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Intent To Request Approval  
From OMB of One New [sic]  
Public Collection of  
Information: Certification of  
Identity Form (TSA Form  
415); TSA-2013-0001-0075,  
FR Doc. 2016-26958

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**COMMENTS OF THE  
CYBER PRIVACY  
PROJECT (CPP)**

Cyber Privacy Project (CPP)

<http://cyberprivacyproject.org/>

The Constitutional Alliance

<http://www.constitutionalalliance.org/>

January 9, 2017

The Cyber Privacy Project (CPP) submits these comments in response to the notice and request for comments, “Intent To Request Approval From OMB of One New [sic] Public Collection of Information: Certification of Identity Form (TSA Form 415)”, docket number TSA-2013-0001-0075, FR Doc. 2016-26958, published at 81 *Federal Register* 78624-78625 (November 8, 2016).

## **I. INTRODUCTION**

“Big Brother in the form of an increasingly powerful government and in an increasingly powerful private sector will pile the records high with reasons why privacy should give way to national security...”

- Justice William O. Douglas

Almost 50 years ago, Justice William O. Douglas, an associate just of the Supreme Court of the United States warned us of the potential for the federal government to impinge on our individual privacy rights. With any policy that impinges in civil liberties, we must balance the restriction of personal liberties with the benefit of increased personal safety. In this case, we believe this policy goes too far.

## **II. ABOUT THE CYBER PRIVACY PROJECT**

### **A. Cyber Privacy Project**

The Cyber Privacy Project (“CPP”) is a non-partisan organization focusing on governmental intrusions against Fourth and Fifth Amendment rights of privacy, particularly in government databanks and national identification schemes for voting, travel and work, and on medical confidentiality and patient consent. CPP director Richard Sobel is a scholar of identity issues, has authored law review articles on the subject, and was an amicus with Privacy Activism in *Hiibel v. Sixth Judicial District of Humboldt County*, 542 U.S. 177. (2004), and with the Program in Psychiatry and Law at Harvard Medical School in *Citizens for Health v. Leavitt*, 428

F.3d 167 (3d Cir. 2005), cert. denied, 127S. Ct. 43 (Oct. 2, 2006). He has taught a course on “The Supreme Court and Privacy,” including identification issues.

#### **B. The Constitutional Alliance**

The Constitutional Alliance is an organization that was established to protect citizens against mandated biometric enrollment. The Constitutional Alliance recognizes that biometrics is the linchpin of a surveillance state which undermines the First, Fourth, and Fifth Amendments to the U.S. Constitution. The Constitutional Alliance is an organization comprised of state/national groups, state legislators, ministries and private citizens. Mark Lerner is the Co-Founder and Spokesperson for the Constitutional Alliance.

#### **III. THE REAL ID ACT IS UNLIKELY TO ACHIEVE ITS STATED GOAL.**

The TSA states: “Secure driver's licenses and identification documents are a vital component of the Department of Homeland Security's (DHS's) national security strategy. In particular, preventing terrorists from obtaining state-issued identification documents is critical to securing the United States against terrorism.”

The stated goal of the TSA is to increase the nation's security through the implementation of the REAL ID Act. However, there is no logical connection between the use of the “REAL ID” for domestic travel and the prevention of terrorist activity.

Given the low probability of successfully preventing a security breach through Real IDs as opposed to more effective forms of intelligence gathering and law enforcement, the TSA is impinging upon a major right of travelers.

#### **IV. THE REAL ID ACT VIOLATES THE CONSTITUTIONALLY PROTECTED RIGHTS OF INDIVIDUALS AS WELL AS THE STATES THEMSELVES.**

The Congressional Research Service Report of 2008 notes, there are many Constitutional issues that REAL ID raises: 10th amendment, federalism and anti-commandeering; freedom of travel, religious freedom against impose of digital photographs, and unfunded mandates on the states.

##### **A. The REAL ID Act Violates Individuals' Rights.**

Chief Justice Melville Fuller, in *Williams v. Fears* (1900):

"... Undoubtedly, the right of locomotion, the right to remove from one place to another according to inclination, is an attribute of personal liberty, and the right, ordinarily, of free transit from or through the territory of any State is a right secured by the Fourteenth Amendment and by other provisions of the Constitution. ..."

(U.S. Constitution, Amendment 1):

"Congress shall make no law ... abridging ... the right of the people peaceably to assemble"

(Universal Declaration of Human Rights, Article 13):

"Everyone has the right to freedom of movement and residence within the borders of each state. Everyone has the right to leave any country, including his own, and to return to his country."

(United Nations Human Rights Committee, General Comment No. 27):

"Liberty of movement is an indispensable condition for the free development of a person."

The mere assertion that the TSA seeks to provide additional security to passengers does not provide adequate justification for abridgement of constitutional rights of the individual.

##### **B. The REAL ID Act Violates States' Rights.**

(U.S. Constitution, Amendment 10):

"The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people."

The states have police powers granted to them under the 10<sup>th</sup> Amendment of the U.S.

Constitution. This is not a federal power, and hence the TSA's imposition of Real ID requirements unconstitutionally violates constitutional principles of federalism and anti-commandeering.

Additionally, the imposition of this rule by the TSA would amount to an unfunded mandate which would violate the Unfunded Mandates Reform Act which was approved in 1995.

## **V. CONCLUSION**

In short, based on the fact that the REAL ID Act is unlikely to achieve its stated goal, that it violates the constitutionally protected rights of individuals as well as the states themselves, and saddles the state governments with an unfunded mandate at a time when most state governments cannot afford it, this proposal should be denied in its entirety.

Respectfully submitted,

Cyber Privacy Project (CPP)

<http://cyberprivacyproject.org/>

The Constitutional Alliance

<http://www.constitutionalalliance.org/>

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Ian Sharping,

Consultant to CPP on travel-related issues

January 9, 2017



**From:** Templeton, Kara  
**Sent:** Mon, 9 Jan 2017 15:00:53 +0000  
**To:** TSAPRA  
**Cc:** Myers, Kurt J  
**Subject:** submission of comment for Intent To Request Approval From OMB of One New Public Collection of Information: Certification of Identity Form (TSA Form 415)

The Pennsylvania Department of Transportation offers the following comments in reference to TSA's request for comment for "Intent To Request Approval From OMB of One New Public Collection of Information: Certification of Identity Form (TSA Form 415)."

- 1) TSA indicates that Form 415 will be updated so that "it is generally only available to travelers who certify that they: reside in or have been issued a driver's license or state identification card by a state that is compliant with the Real ID Act or a state that has been granted an extension by DHS; or have been issued another verifying identity document that TSA accepts." The Pennsylvania Department of Transportation believes there would be inequitable treatment among the residents of states that issue REAL ID compliant products and those states that do not. Even though an individual may reside in a state that issues REAL-ID compliant products, that state may have an opt-in process. As a result, the person may hold a non-compliant product from a compliant state and may be able to use the TSA form; however, a resident from a non-compliant state who holds a similar non-compliant product cannot use the TSA Form 415.

From a legal point of view, there does not appear to be any rational distinction between a resident of a state who has been issued a Real ID non-compliant product and a resident of a state that does not issue Real ID-compliant products at all. As such, TSA's proposal would appear to deny equal protection to similarly situated residents in different states. The department asks TSA to reconsider its policies and procedures related to TSA Form 415 to ensure equitable treatment.

Additionally, clarification is being sought regarding the statement that the form will be "...generally only available to travelers who certify that they: reside in or have been issued a driver's license or state identification card by a state that is compliant with the Real ID Act or a state that has been granted an extension by DHS; or have been issued another verifying identity document that TSA accepts..." The term "generally" seems to indicate that there would be some exceptions where the form would be used. Can TSA clarify when the form may be used by residents of non-compliant states who have not been issued another acceptable form of ID from the TSA list of acceptable identity documents?

- 2) The link contained at the end of the first paragraph under the heading "Information Collection Requirement" to access the list of acceptable verifying documents appears to be invalid. After clicking the link, the user is taken to a TSA webpage that indicates "Page Not Found." We believe "[https://www.tsa.gov/sites/default/files/resources/realid\\_factsheet.pdf](https://www.tsa.gov/sites/default/files/resources/realid_factsheet.pdf)" to be the correct link.

Please contact me if you have any questions.

Thanks,

**Kara N. Templeton** | Director

PA Department of Transportation | Bureau of Driver Licensing

Riverfront Office Center, 4th Floor | 1101 South Front Street | Harrisburg, PA 17104

Phone: (b)(6) Fax: 717.772.5774

[www.penndot.gov](http://www.penndot.gov)

**From:** (b)(6)  
**Sent:** Fri, 9 Dec 2016 10:39:29 -0700  
**To:** TSAPRA  
**Cc:** (b)(6)  
**Subject:** Comments in Response to DHS-2016-26958  
**Attachments:** REAL ID TSA Comments DHS-2016-26958 12-9-2016.pdf

To whom it may concern:

Please see the attached comments regarding DHS-2016-26958 submitted by Keeping IDentities Safe.

Regards,

Andrew Meehan  
Policy Director  
Keeping IDentities Safe  
1300 Pennsylvania Ave NW, Suite 880  
Washington, DC 20004

Office: 202-312-1540

Cell (Preferred): (b)(6)

Follow us:

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# Keeping IDentities Safe®

www.IDsecuritynow.org

December 9, 2016

United States Department of Homeland Security

Transportation Security Administration

[Docket No. DHS-2016-26958]

Intent To Request Approval From OMB of One New Public Collection of Information:  
Certification of Identity Form (TSA Form 415)

Keeping IDentities Safe (KIDS) submits the following comments in response to the Transportation Security Administration's new Information Collection Request (ICR).

## *Background*

Keeping IDentities Safe is a 501(c)(3), non-partisan, not for profit, crime prevention, educational charity based in Washington, D.C. Its central purpose is to raise awareness that weak state systems for issuing driver's licenses and IDs increase the risk from terrorists and criminals who can fraudulently assume new identities to escape detection by law enforcement. Keeping IDentities Safe also educates and encourages parents to secure their children's identities, as well as provides information on the risks under age persons incur when using a counterfeit or fraudulently obtained ID.

Keeping IDentities Safe supports continued enforcement and implementation the federal REAL ID Act rules, and enforcement of the act by the federal government. The REAL ID Act prohibits federal agencies from accepting driver's licenses and state issued identification cards that do not meet certain standards. The REAL ID standards, published in 2008, reduce the risk of identity theft and fraud through the adoption of best practices.

Confirming the identity of travelers prior to boarding an aircraft is a vital component of aviation security. As the 9/11 Commission stated, "At many entry points to vulnerable facilities, including gates of boarding aircraft, sources of identification are the last opportunity to ensure that people are who they say they are and to check whether they are terrorists."<sup>1</sup> The 9/11 Commission Report recommended that the federal government set standards for driver's licenses. 50 states, five territories, and the District of Columbia each issue driver's licenses each under different authorities and processes, largely independent of each other. Prior to passage of the REAL ID Act, the federal government exercised minimal regulation regarding the issuance

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<sup>1</sup> National Commission on Terrorist Attacks upon the United States., Kean, T. H., & Hamilton, L. (2004). *The 9/11 Commission report: Final report of the National Commission on Terrorist Attacks upon the United States*. Washington, D.C.: National Commission on Terrorist Attacks upon the United States.

of driver's licenses, with the exception of regulations pertaining to HAZMAT and Commercial Driver's Licenses and the Driver's Privacy Protection Act. Subsequent REAL ID rules created metrics for the federal government to define the components and characteristics pertinent to the security of a state's driver's license and its reliability as a proof of identity. These metrics and the states' certification of compliance reports provide a basis for the U.S. Department of Homeland Security to determine whether or not it is acceptable for "official purposes."<sup>2</sup>

Keeping IDentities Safe endorses the Department's efforts to enforce the REAL ID Act throughout the United States, and especially by the Transportation Security Agency's (TSA) review of passenger credentials at airports. Currently, TSA treats every driver's license as the same. There is no review of the physical security features nor the application and adjudication process employed by the states to issue driver's licenses and identification cards.

REAL ID enforcement will be the first time TSA agents differentiate driver's licenses to segregate non-compliant states from the majority of compliant states. This notice suggests that TSA anticipates an alternate process for airline travelers who present driver's licenses as proof of identity that were issued by states non-compliant with REAL ID requirements.

Many questions remain regarding how REAL ID will be enforced at the airports. How will travelers be notified at the airports in advance of the scheduled January 2018 enforcement? What kind of signage will precede enforcement and subsequently be posted at airports? Have notices been sent to the airlines so they can notify passengers to bring alternate identification if they do not possess a REAL ID compliant driver's license or ID? What kind of additional personnel will be needed to account for the number of travelers who present noncompliant identification at the airport?

TSA's notice does provide some insight into one part of enforcement: what process would TSA use to confirm the identity of travelers who present driver's licenses from noncompliant states. According to the notice, TSA plans on using knowledge based authentication based on commercial and government databases to confirm the identity of travelers.

### *Comments*

#### **Capture Documentation**

If documentation is presented, TSA should capture the documentation presented via electronic scan. Should a crime be committed, the scan of the identification presented would provide value to an investigation.

#### **Verifying the validity of noncompliant licenses**

The REAL ID standards are intended to mitigate the risk that an individual will present fraudulent identification to assume or create a new identity. However, there is some identity management value that can be attached to a noncompliant license. Statutorily, it is only

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<sup>2</sup> The REAL ID Act defines "official purposes" as presenting state driver's licenses and identification cards for boarding commercially operated airline flights, entering federal buildings and nuclear power plants,

insufficient for "official purposes." TSA should use the noncompliant driver's license, in part, to verify the holder's identity. There are systems that allow for the verification of a limited data set, such as full name, date of birth, and most importantly, the document number of the driver's license.

#### Knowledge based authentication

The notice states that TSA uses knowledge based authentication to verify the identity of a traveler who cannot or will not present sufficient proof of identity at the screening checkpoint. According to DRAFT National Institute of Standards and Technology (NIST) Special Publication 800-63A Digital Authentication Guideline Enrollment and Identity Proofing, using knowledge based authentication as the only means of verifying an identity ranks as "adequate." Given the continued risk to aviation security and the growing availability of complete online identity packages via the Dark Web and Tor networks, we recommend that TSA utilize a multi-factor method of identity verification. According to the NIST standard, a "superior" level of identity verification includes the use of biometrics. Given that the traveler would be submitting only biographic information via a form, TSA should phase in the collection of physical data including a front facial image and fingerprints. If the passenger has been previously enrolled in a federal program, biometric technology can seek to confirm the identity of a traveler. It may also be used to compare that facial image and fingerprints against various watch lists to check for known or suspected terrorists as well as for outstanding wants and warrants.

The knowledge based authentications completed by TSA's Identity Verification Call Center should be conducted consistent with the DRAFT NIST Special Publication 800-63A Digital Authentication Guideline Enrollment and Identity Proofing Requirements. Section 5.3.2. "Knowledge Based Verification Requirements" includes minimum standards for the use of knowledge based verification.

#### Contact:

Brian Zimmer  
President  
Keeping IDentities Safe  
1300 Pennsylvania Ave NW, Suite 880  
Washington, DC 20004

info@idsecuritynow.org  
(202) 312-1540

**From:** Kletzly, Katrina  
**Sent:** Wed, 17 May 2017 19:53:07 +0000  
**To:** McGivern, Tom  
**Subject:** FW: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

FYI, we had a REAL ID meeting today

(b)(5)

**From:** Walsh, Christina  
**Sent:** Wednesday, May 17, 2017 3:38 PM  
**To:** Kletzly, Katrina; Gaudreau, Laura; Houston, Scott; Clunie, Peter; Bryant, Nathan; Thompson, Mardi; Murphy, Brenna; Cossairt, Tim; Tadros, Anthony (CTR); Purnell, John; Pietra, Peter; Schmidt, Jennifer  
**Cc:** Stuart, Joseph  
**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

Hi All,

(b)(5)

Let me know if you have any questions.

Kind regards,

*Christina*

Christina A. Walsh  
Program Specialist  
Mission Support Division  
Office of Information Technology  
Transportation Security Administration

TSA/DHS Email: (b)(6)

Office 571-227- (b)(6)



Mobile

(b)(6)

"The ultimate measure of a man is not where he stands in moments of comfort and convenience, but where he stands at times of challenge and controversy."....MLK (1963)

-----Original Appointment-----

**From:** Walsh, Christina

**Sent:** Wednesday, May 17, 2017 9:05 AM

**To:** Pietra, Peter; Schmidt, Jennifer

**Subject:** 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

**When:** Wednesday, May 17, 2017 1:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** 1-877-951-2114; A/C

(b)(2)

Hi All,

This meeting is to address the following:

Responses to the comments. See the attached zip file and email.

Review of the 30-day notice & Supporting Statement. Click [here](#) to access these documents.

Kind regards,

*Christina*

Christina A. Walsh

Program Specialist

Mission Support Division

Office of Information Technology

Transportation Security Administration

TSA/DHS Email

(b)(6)

Office 571-227

(b)(6)

Mobile

(b)(6)



**From:** Gaudreau, Laura  
**Sent:** Tue, 20 Sep 2016 18:34:54 +0000  
**To:** Walsh, Christina  
**Cc:** Kletzly, Katrina  
**Subject:** RE: 1652-NEW Certification of Identity (COI) Form (TSA Form 415); 60DN

Thank you, Christina.

**Laura Gaudreau**  
Attorney Advisor  
Office of Chief Counsel – Regulations and Security Standards  
Transportation Security Administration  
Tel. 571 227- (b)(6) Mobile: (b)(6)

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**From:** Walsh, Christina  
**Sent:** Tuesday, September 20, 2016 2:29 PM  
**To:** Kletzly, Katrina; Gaudreau, Laura  
**Subject:** RE: 1652-NEW Certification of Identity (COI) Form (TSA Form 415); 60DN

Hi Ladies,

(b)(5)  
I am out of the office for the rest of the week and will miss the scheduled 9/22 team meeting.

Thanks again for your help on the document.

*Christina*

**Christina A. Walsh**  
Program Specialist  
Mission Support Division  
Office of Information Technology  
Transportation Security Administration

**TSA/DHS Email:** (b)(6)  
**Office (571) 227:** (b)(6)  
**Mobile:** (b)(6)

**From:** Kletzly, Katrina  
**Sent:** Tuesday, September 20, 2016 8:32 AM  
**To:** Gaudreau, Laura; Walsh, Christina  
**Subject:** RE: 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN

Thanks Laura.

(b)(5)

Christina, once OSO has updated the form per the comments can you send back to us for another look please? Thanks!

Katrina Kletzly  
Senior Counsel  
Office of Chief Counsel  
Transportation Security Administration  
412-375-(b)(6)esk)  
(b)(6)cell)

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**From:** Gaudreau, Laura  
**Sent:** Monday, September 19, 2016 5:49 PM  
**To:** Kletzly, Katrina; Walsh, Christina  
**Subject:** RE: 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN

My suggested edits and comments have been added to Katrina's on iShare.

Thank you,

**Laura Gaudreau**  
Attorney Advisor  
Office of Chief Counsel – Regulations and Security Standards  
Transportation Security Administration  
Tel: 571 227-(b)(6) Mobile: (b)(6)

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**From:** Kletzly, Katrina  
**Sent:** Friday, September 16, 2016 1:55 PM  
**To:** Walsh, Christina; Gaudreau, Laura  
**Subject:** RE: 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN

Ladies my suggested edits and comments are in iShare.

Katrina

Katrina Kletzly  
Senior Counsel  
Office of Chief Counsel  
Transportation Security Administration  
412-375- (b)(6) esk)  
(b)(6) cell)

This communication might contain communications between attorney and client, communications that are part of the agency deliberative process, or attorney-work product, all of which are privileged and not subject to disclosure outside the agency or to the public. Please consult with the Office of Chief Counsel before disclosing any information contained in this email.

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**From:** Walsh, Christina  
**Sent:** Thursday, September 15, 2016 12:15 PM  
**To:** Gaudreau, Laura; Kletzly, Katrina  
**Subject:** RE: 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN

Ladies,

Please click [here](#) to review the draft of the 60-day notice. The burden section is incomplete but the economist promise to have it completed no later than Monday.

Kind regards,

*Christina*

**Christina A. Walsh**  
**Program Specialist**  
**Mission Support Division**  
**Office of Information Technology**  
**Transportation Security Administration**

**TSA/DHS Email:** (b)(6)  
**Office (571) 227** (b)(6)  
**Mobile** (b)(6)

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**From:** Gaudreau, Laura  
**Sent:** Thursday, September 15, 2016 10:49 AM  
**To:** Walsh, Christina; Klemm, Traci; Thompson, Mardi  
**Cc:** Kletzly, Katrina; Lewis, Tonya  
**Subject:** RE: 1652-NEW Certification of Identity Form TSA Form 415; 60DN

Christina,

I can be the reviewer for the PRA.

Thank you,

**Laura Gaudreau**  
Attorney Advisor  
Office of Chief Counsel – Regulations and Security Standards  
Transportation Security Administration  
Tel: 571 227- (b)(6) Mobile: (b)(6)

**Warning:** This communication might contain communications between attorney and client, communications that are part of the Agency's deliberative process, or attorney work-product, all of which are privileged and not subject to disclosure outside the Agency or to the public. Please consult with the Office of Chief Counsel before disclosing any information contained in this e-mail.

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**From:** Walsh, Christina  
**Sent:** Thursday, September 15, 2016 10:35 AM  
**To:** Klemm, Traci; Thompson, Mardi; Gaudreau, Laura  
**Cc:** Kletzly, Katrina; Lewis, Tonya  
**Subject:** RE: 1652-NEW Certification of Identity Form TSA Form 415; 60DN

Traci,

Thank you!

Mardi/Laura,

Which one of you will review? I will need to give you rights to the PRA lshare folder.

Kind regards,

*Christina*

**Christina A. Walsh**  
Program Specialist  
Mission Support Division  
Office of Information Technology  
Transportation Security Administration

**TSA/DHS Email:** (b)(6)

Office (571) 227-

(b)(6)

Mobile

(b)(6)

**From:** Klemm, Traci

**Sent:** Thursday, September 15, 2016 10:33 AM

**To:** Walsh, Christina

**Cc:** Kletzly, Katrina; Thompson, Mardi; Lewis, Tonya; Gaudreau, Laura

**Subject:** RE: 1652-NEW Certification of Identity Form TSA Form 415; 60DN

Mardi or Laura Gaudreau can review.

Traci S. Klemm | Assistant Chief Counsel, Regulations and Security Standards | 571.227-

(b)(6)

---

**From:** Walsh, Christina

**Sent:** Thursday, September 15, 2016 10:00 AM

**To:** Klemm, Traci

**Cc:** Kletzly, Katrina; Thompson, Mardi; Lewis, Tonya

**Subject:** 1652-NEW Certification of Identity Form TSA Form 415; 60DN

Morning Traci,

(b)(5)

Kind regards,

*Christina*

**Christina A. Walsh**

**Program Specialist**

**Mission Support Division**

**Office of Information Technology**

**Transportation Security Administration**

**TSA/DHS Email:**

(b)(6)

**Office (571) 227-**

(b)(6)

**Mobile**

(b)(6)

**From:** Goldman, Howard

**Sent:** Thursday, September 15, 2016 9:26 AM

**To:** Cossairt, Tim; Walsh, Christina; Pickford, Michael; Clunie, Peter; Purnell, John

**Cc:** Houston, Scott; Murphy, Brenna; Kletzly, Katrina; Ronan, Daniel; Eldridge, Annett; Tuculescu, Roxana; Pietra, Peter

**Subject:** RE: IVCC- Supporting Statement

(b)(5)

See attached.



Thanks,

Howard

Howard Goldman  
Senior Counselor  
Office of the Administrator  
Transportation Security Administration  
571-227- (b)(6) D)  
(b)(6) C)

---

**From:** Cossairt, Tim  
**Sent:** Wednesday, September 14, 2016 3:58 PM  
**To:** Goldman, Howard; Walsh, Christina; Pickford, Michael; Clunie, Peter; Purnell, John  
**Cc:** Houston, Scott; Murphy, Brenna; Kletzly, Katrina; Ronan, Daniel; Eldridge, Annett  
**Subject:** RE: IVCC- Supporting Statement

Howard,

(b)(5)

Tim

---

Tim Cossairt  
Branch Manager – Resolution Support Branch/Identity Verification  
National Transportation Vetting Center (NTVC)  
Office of Intelligence and Analysis  
Mobile telephone (b)(6)  
Freedom Center Office 571-354- (b)(6)

*Safeguarding Travel and Commerce through Integrated Vetting and Analysis*

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**From:** Goldman, Howard  
**Sent:** Wednesday, September 14, 2016 3:36 PM  
**To:** Walsh, Christina; Pickford, Michael; Clunie, Peter; Purnell, John  
**Cc:** Houston, Scott; Murphy, Brenna; Kletzly, Katrina; Ronan, Daniel; Eldridge, Annett; Cossairt, Tim  
**Subject:** RE: IVCC- Supporting Statement

Christina – (b)(5)  
I will work on that probably tomorrow morning.

(b)(5)

(b)(5)

Thanks,

Howard

Howard Goldman  
Senior Counselor  
Office of the Administrator  
Transportation Security Administration

571-227- (b)(6) D)

(b)(6) C)

**From:** Walsh, Christina

**Sent:** Wednesday, September 14, 2016 12:00 PM

**To:** Pickford, Michael; Clunie, Peter; Purnell, John

**Cc:** Houston, Scott; Goldman, Howard; Murphy, Brenna; Kletzly, Katrina; Ronan, Daniel; Eldridge, Annett; Cossairt, Tim

**Subject:** RE: IVCC- Supporting Statement

Peter,

Please see the attached draft of the 60-day notice. Edit accordingly.

Mike/John,

I left a placeholder in the notice for EAB's input.

Kind regards,

*Christina*

**Christina A. Walsh**  
**Program Specialist**  
**Mission Support Division**  
**Office of Information Technology**  
**Transportation Security Administration**

**TSA/DHS Email:** (b)(6)

**Office (571) 227-** (b)(6)

**Mobile** (b)(6)

**From:** Murphy, Brenna

**Sent:** Wednesday, September 14, 2016 7:37 AM

**To:** Goldman, Howard; Houston, Scott; Pickford, Michael; Walsh, Christina; Kletzly, Katrina; Cossairt, Tim; Ronan, Daniel; Clunie, Peter; Eldridge, Annett

**Subject:** IVCC- Supporting Statement

Good Morning,

OSO Security Procedures has completed our portion [redacted] (b)(5) (Paperwork  
Reduction Act [redacted] If any  
procedural modifications are made, we can review for procedural accuracy.

Thank you,

Brenna Murphy  
Section Chief, Screening Procedures  
Office of Security Operations  
Transportation Security Administration  
(571) 227-[redacted] (b)(6)

[redacted] (b)(6)

**From:** Bryant, Nathan  
**Sent:** Thu, 27 Apr 2017 22:34:52 +0000  
**To:** Kilgarriff, Laura;Kletzly, Katrina;Thompson, Mardi  
**Subject:** FW: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

Need to chat about (b)(5) I have a few issues:

1. I am not going to be able to work on this before next Friday. I am swamped

(b)(5)

(b)(5)

(b)(8)

(b)(8)

So maybe I can hand off responsibility for whatever parts I am supposed to write. I will share the incomplete analysis I have at the moment.

(b)(5)

(b)(5)

Nathan S. Bryant  
Attorney-Advisor, Federal Court Litigation  
Office of Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)

Office: 571-227-

(b)(6)

Mobile:

(b)(6)

**From:** Walsh, Christina

**Sent:** Thursday, April 27, 2017 3:57 PM

**To:** Bryant, Nathan

(b)(6)

**Subject:** FW: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

Will you be able to work with Laura to provide the language to respond to the comments for the meeting?

Kind regards,

*Christina*

Christina A. Walsh  
Program Specialist  
Mission Support Division  
Office of Information Technology  
Transportation Security Administration

**TSA/DHS Email:**

(b)(6)

**Office 571-227-**

(b)(6)

**Mobile:**

(b)(6)

-----Original Appointment-----

**From:** Bryant, Nathan

**Sent:** Thursday, April 27, 2017 3:51 PM

**To:** Walsh, Christina

**Subject:** Declined: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

**When:** Wednesday, May 17, 2017 1:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** 1-877-951-2114; A/c

(b)(2)



**From:** Thompson, Mardi  
**Sent:** Tue, 31 Jan 2017 10:46:57 -0500  
**To:** Walsh, Christina;Houston, Scott;Kletzly, Katrina;Kilgarrieff, Laura  
**Cc:** Clunie, Peter;Murphy, Brenna;Bryant, Nathan;Cossairt, Tim  
**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415)

Folks, I was out last week, so I do not have all the details, but I just spoke with Laura about our assignment. May I suggest the following (please forgive if you are ahead of me on this):

(b) (5)

Thanks, folks.

Mardi Ruth Thompson  
Senior Counsel  
Regulations & Security Standards Division  
Transportation Security Administration  
Department of Homeland Security  
Phone: 202-365- (b)(6)  
Internet: (b)(6)

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**From:** Walsh, Christina  
**Sent:** Thursday, January 26, 2017 5:21 PM  
**To:** Houston, Scott (b)(6); Kletzly, Katrina (b)(6)  
Gaudreau, Laura (b)(6)  
**Cc:** Clunie, Peter (b)(6); Murphy, Brenna (b)(6)

Thompson, Mardi <(b)(6)>  
Cossairt, Tim <(b)(6)>

Nathan <(b)(6)>

**Subject:** 1652-NEW Certification of Identity (TSA Form 415)

Hi All,

Thanks for getting on the call today to discuss the 5 comments to the 60-day notice for 1652-NEW Certification of Identity (TSA Form 415). Also, Laura was able to get us the additional 2 comments from Regulations.gov. I have attached them to this email as Comments 6 and 7. Both comments were anonymous.

(b) (5)

Nathan,

(b)(5)

Tim,

(b)(5)

Katrina,

Comment 6 is asking that the ICR be withdrawn because the commenter wasn't able to see the form.

(b)(5)

Nathan & Laura,

(b)(5)

(b)(5)

I will send out an invite for **February 23, 2017** to discuss the finalization of the responses to the comments.

Kind regards,

*Christina*

**Christina A. Walsh**  
**Program Specialist**  
**Mission Support Division**  
**Office of Information Technology**  
**Transportation Security Administration**

**TSA/DHS Email:** (b)(6)

**Office 571-227-** (b)(6)

**Mobile** (b)(6)

**From:** Kletzly, Katrina  
**Sent:** Mon, 22 May 2017 18:31:45 +0000  
**To:** Gaudreau, Laura;Thompson, Mardi  
**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

Laura,  
I'm fine with your change

(b)(5)

(b)(5)

Katrina Kletzly  
Senior Counsel  
Office of Chief Counsel  
Transportation Security Administration  
412-375-(b)(6)esk)  
(b)(6)ell)

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**From:** Gaudreau, Laura  
**Sent:** Monday, May 22, 2017 2:18 PM  
**To:** Kletzly, Katrina; Thompson, Mardi  
**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

I just finished my review of (b)(5) if either of you have time, do you mind briefly looking at both documents again?

(b)(5)

I'm available to talk if you have any questions.

Thank you,

**Laura Gaudreau**  
Attorney Advisor  
Office of Chief Counsel – Regulations and Security Standards  
Transportation Security Administration  
Tel: 571 227-(b)(6) Mobile: (b)(6)

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**From:** Kletzly, Katrina

**Sent:** Friday, May 19, 2017 2:50 PM

**To:** Thompson, Mardi (b)(6) Gaudreau, Laura

(b)(6)

**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

(b)(5)

Katrina Kletzly  
Senior Counsel  
Office of Chief Counsel  
Transportation Security Administration  
412-375 (b)(6) desk)  
(b)(6) ell)

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**From:** Thompson, Mardi

**Sent:** Friday, May 19, 2017 11:02 AM

**To:** Kletzly, Katrina; Gaudreau, Laura

**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

(b)(5)



Mardi Ruth Thompson  
Senior Counsel  
Regulations & Security Standards Division  
Transportation Security Administration  
Department of Homeland Security  
Phone: 202-365- (b)(6)  
Internet: (b)(6)

**ATTORNEY-CLIENT PRIVILEGED/ATTORNEY WORK PRODUCT**

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**From:** Kletzly, Katrina  
**Sent:** Friday, May 19, 2017 8:59 AM  
**To:** Gaudreau, Laura <(b)(6)> Thompson, Mardi  
<(b)(6)>  
**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

I reviewed (b)(5)  
(b)(5) Mardi, let me know when you are (b)(5) and I will review next.

Katrina Kletzly  
Senior Counsel  
Office of Chief Counsel  
Transportation Security Administration  
412-375- (b)(6) desk)  
(b)(6) ell)

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---

**From:** Gaudreau, Laura  
**Sent:** Thursday, May 18, 2017 11:29 AM  
**To:** Kletzly, Katrina; Thompson, Mardi  
**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

Mardi and Katrina,

I have reviewed (b)(5) will be at a conference this afternoon and all day Friday, so I will plan to review (b)(5) Monday morning.

Thank you,

**Laura Gaudreau**

Attorney Advisor

Office of Chief Counsel – Regulations and Security Standards

Transportation Security Administration

Tel: 571 227- (b)(6) | Mobile: (b)(6)

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**From:** Kletzly, Katrina

**Sent:** Thursday, May 18, 2017 9:45 AM

**To:** Thompson, Mardi (b)(6) Gaudreau, Laura

(b)(6)

**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

I'll review (b)(6) after both of you have.

---

**From:** Thompson, Mardi

**Sent:** Wednesday, May 17, 2017 5:20 PM

**To:** Gaudreau, Laura

**Cc:** Kletzly, Katrina

**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

Laura, please let me know when you have commented, I would like to review after that. Thanks.

**Mardi Ruth Thompson**

Senior Counsel

Regulations & Security Standards Division

Transportation Security Administration

Department of Homeland Security

Phone: 202-365- (b)(6)

Internet (b)(6)

**ATTORNEY-CLIENT PRIVILEGED/ATTORNEY WORK PRODUCT**

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**From:** Gaudreau, Laura

**Sent:** Wednesday, May 17, 2017 3:48 PM

**To:** Walsh, Christina <(b)(6)>

**Cc:** Thompson, Mardi <(b)(6)>

**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

Christina,

Thank you- I'll give (b)(5); I will be out of the office from noon tomorrow through Friday. I should be able to fully review on Monday, (b)(5)

Thank you,

**Laura Gaudreau**

Attorney Advisor

Office of Chief Counsel Regulations and Security Standards

Transportation Security Administration

Tel: 571 227-(b)(6) Mobile: (b)(6)

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**From:** Walsh, Christina

**Sent:** Wednesday, May 17, 2017 3:38 PM

**To:** Kletzly, Katrina

Houston, Scott

Nathan

Brenna

(CTR)

(b)(6)

Thompson, Mardi

Cossairt, Tim

Purnell, John

Schmidt, Jennifer

Gaudreau, Laura

Clunie, Peter

(b)(6)

Bryant,

Murphy,

Tadros, Anthony

Pietra, Peter

Cc: Stuart, Joseph

(b)(6)

**Subject:** RE: 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

Hi All,

(b)(6)

Let me know if you have any questions.

Kind regards,

*Christina*

**Christina A. Walsh**  
**Program Specialist**  
**Mission Support Division**  
**Office of Information Technology**  
**Transportation Security Administration**

**TSA/DHS Email:**

(b)(6)

**Office 571-227**

(b)(6)

**Mobile**

(b)(6)

“The ultimate measure of a man is not where he stands in moments of comfort and convenience, but where he stands at times of challenge and controversy.”...MLK (1963)

-----Original Appointment-----

**From:** Walsh, Christina

**Sent:** Wednesday, May 17, 2017 9:05 AM

**To:** Pietra, Peter; Schmidt, Jennifer

**Subject:** 1652-NEW Certification of Identity (TSA Form 415); Meeting to address comments, 30 notice and SS

**When:** Wednesday, May 17, 2017 1:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** 1-877-951-2114; A/4

(b)(2)

Hi All,

This meeting is to address the following:

Responses to the comments. See the attached zip file and email.

Review of the 30-day notice & Supporting Statement. Click [here](#) to access these documents.

Kind regards,

*Christina*

**Christina A. Walsh**  
**Program Specialist**  
**Mission Support Division**  
**Office of Information Technology**  
**Transportation Security Administration**

**TSA/DHS Email:** (b)(6)

**Office 571-227** (b)(6)

**Mobile** (b)(6)

**From:** Bryant, Nathan  
**Sent:** Thu, 11 May 2017 22:22:47 +0000  
**To:** Houston, Scott  
**Cc:** Prosnitz, Susan;Thompson, Mardi;Kilgarriff, Laura;Kletzly, Katrina;Wheaton, Kelly  
**Subject:** [REDACTED]  
**Attachments:** [REDACTED]

Scott,

[REDACTED]

As discussed, [REDACTED] The rest of the document looks good from OCC's perspective (Katrina, et al., correct me if I am wrong).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thanks,

Nathan S. Bryant  
Attorney-Advisor, Federal Court Litigation  
Office of Chief Counsel  
Transportation Security Administration

U.S. Department of Homeland Security

(b)(6)

Office: 571-227

(b)(6)

Mobile

(b)(6)

**From:** Gaudreau, Laura  
**Sent:** Tue, 28 Feb 2017 20:22:12 +0000  
**To:** Bryant, Nathan  
**Subject:** FW: Coalition letter to OMB re TSA failure to publish supporting docs on Form 415

-----Original Message-----

From: Sai [mailto:(b)(6)]  
Sent: Friday, February 17, 2017 6:27 AM  
To: OIRA submission@omb.eop.gov; media@omb.eop.gov; (b)(6)  
(b)(6)  
Cc: TSAPRA <TSAPRA@tsa.dhs.gov>; Walsh, Christina (b)(6)  
Subject: Re: Coalition letter to OMB re TSA failure to publish supporting docs on Form 415

Dear OMB -

44 USC 3517(b)(1) required that you "respond to the request within 60 days after receiving the request, unless such period is extended by the Director to a specified date and the person making the request is given notice of such extension".

Our request was sent November 25, 2016; the 60 day deadline was January 24, 2017, almost a month ago. I've received no response.

Please let me know your ETA, or your formal extension notice. I look forward to receiving your response to the coalition's letter.

As mentioned in the letter, please respond only by email, preferably as a § 508 compliant PDF.

Sincerely,  
Sai

On Tue, Nov 29, 2016 at 3:50 PM, Sai <(b)(6)>

> /cc Wendy per Nicholas Fraser's away autoresponse

>

> On Tue, Nov 29, 2016 at 10:35 AM, Sai <(b)(6)> wrote:

>> Dear OMB & TSA:

>>

>> Government Accountability Project has also signed on to this letter.

>>

>> Sincerely,

>> Sai

>>

>> On Fri, Nov 25, 2016 at 11:46 AM, Sai <(b)(6)>

>>> Dear OMB OIRA / PRA office:

>>>

>>> Please see attached coalition letter, invoking 44 USC § 3517,

>>> regarding TSA's pending PRA notice, 81 FR 78623 /

>>> <<https://www.federalregister.gov/documents/2016/11/08/2016-26958-intent-to-request-approval-from-omb-of-one-new-public-collection-of-information-certification-of>>.

>>>

>>> We ask that Director Donovan require TSA to publish the full ICR



>>> supporting documentation (for both Form 415 and IVCC), and ensure  
>>> full opportunity for public notice and comment, before allowing any  
>>> PRA action on this to proceed.

>>>

>>> Please send your response to me by email. Feel free to call me at +1

>>> (b)(6) if you have any questions.

>>>

>>> I would appreciate if, pending a response, you acknowledge receipt  
>>> of this letter by someone within OMB in charge of 44 USC § 3517.

>>>

>>> Sincerely,

>>> Sai

>>>

>>> /cc TSA PRA office

**From:** Bryant, Nathan  
**Sent:** Thu, 3 Mar 2016 22:59:48 +0000  
**To:** Prosnitz, Susan;Klemm, Traci;Thompson, Mardi <TSA OCC>;Flory, Gillian <TSA  
OCC>;Houlihan, Kevin G;Pilcher, Marc;Itami, Brian  
**Subject:** (b)(5)

Hi all,

(b)(5)

(b)(5)

Nathan S. Bryant  
Special Legal Assistant to the Chief Counsel  
Transportation Security Administration

U.S. Department of Homeland Security

(b)(6)

Office: 571-227- (b)(6)

Mobile: (b)(6)

**From:** Gaudreau, Laura  
**Sent:** Thu, 4 May 2017 19:51:26 +0000  
**To:** Thompson, Mardi  
**Subject:** FW: Draft email

(b)(5)

**From:** Gaudreau, Laura  
**Sent:** Wednesday, May 3, 2017 12:45 PM  
**To:** Prosnitz, Susan (b)(6); Bryant, Nathan (b)(6)  
Wheaton, Kelly (b)(6); Bauer, John (b)(6); Thompson, Mardi (b)(6)  
**Subject:** RE: Draft email (b)(5)

All,

Minor edit- I suggest

(b)(5)

(b)(5)

(b)(5)

Thank you,

**Laura Gaudreau**  
Attorney Advisor  
Office of Chief Counsel – Regulations and Security Standards  
Transportation Security Administration  
Tel: 571 227 (b)(6) Mobile: (b)(6)

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**From:** Prosnitz, Susan

**Sent:** Wednesday, May 3, 2017 12:21 PM

**To:** Bryant, Nathan <(b)(6)> Wheaton, Kelly <(b)(6)>

Bauer, John <(b)(6)> Gaudreau, Laura <(b)(6)> Thompson,

Mardi <(b)(6)>

**Subject:** RE: Draft email <(b)(5)>

**Importance:** High

Kelly,

(b)(5)

(b)(5) Note that (b)(5) I would suggest

(b)(5)

(b)(5)

**Susan M. Prosnitz**

Deputy Chief Counsel for Regulations and Security Standards

Office of Chief Counsel

Transportation Security Administration

571.227. (b)(6) office

(b)(6) mobile

(b)(6)

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*COUNSEL BEFORE DISCLOSING ANY INFORMATION CONTAINED IN THIS E-MAIL.*

**From:** Bryant, Nathan

**Sent:** Wednesday, May 3, 2017 11:25 AM

**To:** Wheaton, Kelly <(b)(6)> Prosnitz, Susan <(b)(6)>

Bauer, John <(b)(6)>; Gaudreau, Laura <(b)(6)> Thompson,

Mardi <(b)(6)>

**Subject:** Draft email (b)(5)

Hi all,

Below is my quick analysis

(b)(5)

(b)(5)

Nathan S. Bryant  
Attorney-Advisor, Federal Court Litigation  
Office of Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

[Redacted]

Office: 571-227-[Redacted]

Mobile: [Redacted]



**From:** Bryant, Nathan  
**Sent:** Tue, 15 Mar 2016 21:22:58 +0000  
**To:** Whalen, MaryKate; McGivern, Tom; Flory, Gillian <TSA OCC>  
**Cc:** Byrne, Eileen  
**Subject:** FW: IVCC form  
**Attachments:** TSA Form 415 FINAL 130522.docx

Hi everyone,

Howard Goldman is leading an effort to

(b)(5)

(b)(5)

I will set up a meeting to discuss this sometime on Thursday or maybe early next week. Please let me know who should be involved.

Thanks,

Nathan S. Bryant  
Special Legal Assistant to the Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)

Office: 571-227- (b)(6)

Mobile: (b)(6)

---

**From:** Goldman, Howard <TSA Exec Ofc>  
**Sent:** Tuesday, March 15, 2016 2:21 PM  
**To:** Houston, Scott; Bryant, Nathan <TSA OCC>  
**Subject:** IVCC form

Here's the IVCC intake form in its entirety as posted on our intranet site.

Howard

Howard Goldman  
Senior Counselor  
Office of the Administrator  
Transportation Security Administration

571-227- (b)(6) (D)

(b)(6) (C)

**From:** Gaudreau, Laura K.  
**Sent:** Mon, 28 Mar 2016 20:01:32 +0000  
**To:** Prosnitz, Susan <TSA OCC>;Thompson, Mardi <TSA OCC>  
**Subject:** RE: Draft IVCC Memo

(b)(5)

---

**From:** Prosnitz, Susan <TSA OCC>  
**Sent:** Monday, March 28, 2016 4:00 PM  
**To:** Gaudreau, Laura K. <TSA OCC>; Thompson, Mardi <TSA OCC>  
**Subject:** RE: Draft IVCC Memo

(b)(5)

**Susan M Prosnitz**  
Deputy Chief Counsel for Regulations and Security Standards  
Office of Chief Counsel  
Transportation Security Administration  
571 227 (b)(6) (office)  
(b)(6) (mobile)  
(b)(6)

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---

**From:** Gaudreau, Laura K. <TSA OCC>  
**Sent:** Monday, March 28, 2016 3:37 PM  
**To:** Prosnitz, Susan <TSA OCC>; Thompson, Mardi <TSA OCC>  
**Subject:** RE: Draft IVCC Memo

I have no edits to the memo

(b) 5

(b)(5)

Thanks,

**Laura Gaudreau**  
Attorney Advisor  
Office of Chief Counsel – Regulations and Security Standards  
Transportation Security Administration  
Tel: 571 227- (b)(6) Mobile: (b)(6)

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**From:** Prosnitz, Susan <TSA OCC>  
**Sent:** Monday, March 28, 2016 2:44 PM  
**To:** Thompson, Mardi <TSA OCC>; Gaudreau, Laura K. <TSA OCC>  
**Subject:** FW: Draft IVCC Memo

(b)(5)

**Susan M. Prosnitz**  
Deputy Chief Counsel for Regulations and Security Standards  
Office of Chief Counsel  
Transportation Security Administration  
571 227- (b)(6) (office)  
(b)(6) mobile)  
(b)(6)

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**From:** Bryant, Nathan <TSA OCC>  
**Sent:** Monday, March 28, 2016 2:42 PM  
**To:** Flory, Gillian <TSA OCC>; Pilcher, Marc <TSA OCC>; Houlihan, Kevin G <TSA OCC>; Prosnitz, Susan <TSA OCC>; McGivern, Tom <TSA OCC>; Kletzly, Katrina <TSA OCC>; Perel, Erica <TSA OCC>  
**Subject:** Draft IVCC Memo

Hi all,

Scott Houston sent the attached memo

(b)(5)

I have suggested

Please

let me know before noon tomorrow if you have any serious concerns.

Thanks,

Nathan S. Bryant  
Special Legal Assistant to the Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

[Redacted] (b)(6)

Office: 571-227-[Redacted] (b)(6)

Mobile: [Redacted] (b)(6)

**From:** Thompson, Mardi <TSA OCC>  
**Sent:** Tue, 29 Mar 2016 11:59:33 -0400  
**To:** Prosnitz, Susan; Kilgariff, Laura; Bryant, Nathan; Flory, Gillian <TSA OCC>; Pilcher, Marc; Houlihan, Kevin G; McGivern, Tom; Kletzly, Katrina; Perel, Erica <TSA OCC>  
**Subject:** RE: Draft IVCC Memo  
**Attachments:** Action memo (b)(6) 23 Mar 16 sh (OCC comments 3-28-16)+Mardi 3-29.docx

My recommendations attached. Thank you.

**Mardi Ruth Thompson**

Senior Counsel

Regulations & Security Standards Division

Transportation Security Administration

Department of Homeland Security

Phone: (b)(6)

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**ATTORNEY-CLIENT PRIVILEGED/ATTORNEY WORK PRODUCT**

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*COUNSEL BEFORE DISCLOSING ANY INFORMATION CONTAINED IN THIS E-MAIL*

**From:** Bryant, Nathan <TSA OCC>  
**Sent:** Monday, March 28, 2016 2:42 PM  
**To:** Flory, Gillian <TSA OCC>; Pilcher, Marc <TSA OCC>; Houlihan, Kevin G <TSA OCC>; Prosnitz, Susan <TSA OCC>; McGivern, Tom <TSA OCC>; Kletzly, Katrina <TSA OCC>; Perel, Erica <TSA OCC>  
**Subject:** Draft IVCC Memo

Hi all,

Scott Houston sent the attached memo (b)(5) I have suggested  
Please let me know before noon tomorrow if you have any serious concerns.

Thanks,

**Nathan S. Bryant**  
Special Legal Assistant to the Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)

Office: 571-227- (b)(6)

Mobile: (b)(6)

**From:** Bryant, Nathan  
**Sent:** Wed, 26 Oct 2016 13:44:24 +0000  
**To:** Prosnitz, Susan;Klemm, Traci;Kletzly, Katrina;Kilgarrieff, Laura;Perel, Erica <OCC>  
(b)(6)  
**Subject:** FW: PRA Notice for revised TSA Form 415  
**Attachments:** 1652-NEW COI TSA Form 415 60DN OCC comments of 20161024 clean (NSB).docx

I would like to get feedback on this today so that I can send it on to Christina Walsh.

Nathan S. Bryant  
Special Legal Assistant to the Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)  
Office: 571-227- (b)(6)  
Mobile: (b)(6)

---

**From:** Bryant, Nathan  
**Sent:** Tuesday, October 25, 2016 5:05 PM  
**To:** Prosnitz, Susan; Klemm, Traci; Kletzly, Katrina; Gaudreau, Laura; Perel, Erica <OCC>  
(b)(6)  
**Subject:** PRA Notice for revised TSA Form 415

OCC only,

Attached are my revisions to the October 24 clean version of the document. Please review and let me know if you would like to discuss anything. Please do not make additional comments on top of mine at this point. If we need to make changes, let's have a quick meeting. I want to go back to Christina Walsh (and Howard Goldman and Scott Houston) with just one consolidated markup from OCC.

Thanks,

Nathan S. Bryant  
Special Legal Assistant to the Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)  
Office: 571-227- (b)(6)  
Mobile: (b)(6)

**From:** Gaudreau, Laura  
**Sent:** Mon, 13 Feb 2017 19:22:51 +0000  
**To:** Walsh, Christina  
**Subject:** FW: Work Folder 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN is currently awaiting your approval  
**Attachments:** 1652-NEW COI TSA Form 415 60DN OCC comments of 20161024 clean.docx

**From:** Gaudreau, Laura  
**Sent:** Monday, October 24, 2016 12:41 PM  
**To:** Klemm, Traci <Traci.Klemm@tsa.dhs.gov>  
**Subject:** FW: Work Folder 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN is currently awaiting your approval

FYI

---

**From:** Walsh, Christina  
**Sent:** Monday, October 24, 2016 12:39 PM  
**To:** Houston, Scott; Goldman, Howard; Kletzly, Katrina; Gaudreau, Laura  
**Subject:** FW: Work Folder 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN is currently awaiting your approval

All,

Attached is the final version of the 60-day notice. I will submit to OCC admin for publication in the Federal Register if there are no objections.

Kind regards,

*Christina*

**Christina A. Walsh**  
**Program Specialist**  
**Mission Support Division**  
**Office of Information Technology**  
**Transportation Security Administration**

**TSA/DHS Email:** (b)(6)  
**Office 571-227** (b)(6)  
**Mobile** (b)(6)

---

**From:** McGivern, Tom  
**Sent:** Monday, October 24, 2016 12:29 PM  
**To:** Walsh, Christina



**Subject:** RE: Work Folder 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN is currently awaiting your approval

Christina, (b)(5)

(b)(5)

For ease a reading, a clean version

is attached. Thx! Tom

---

**From:** Walsh, Christina

**Sent:** Friday, October 21, 2016 9:00 AM

**To:** McGivern, Tom

**Cc:** Lewis, Tonya

**Subject:** FW: Work Folder 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN is currently awaiting your approval

Hi Tom,

I have reassigned the folder to you. Thanks for your review.

Kind regards,

*Christina*

**Christina A. Walsh**

**Program Specialist**

**Mission Support Division**

**Office of Information Technology**

**Transportation Security Administration**

**TSA/DHS Email:** (b)(6)

**Office 571-227** (b)(6)

**Mobil** (b)(6)

---

**From:** Perel, Erica

**Sent:** Friday, October 21, 2016 8:43 AM

**To:** Walsh, Christina

**Subject:** FW: Work Folder 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN is currently awaiting your approval

Christina,

Can you reassign to Tom, he is back (however, he is off for just today ☺), I was covering for him. He is still in the best position to review the PRAs after Traci Klem. Thanks.

Erica

Erica G. Perel

Senior Counsel

Office of Chief Counsel, DHS/TSA

Tel: 571-227-(b)(6) ell: (b)(6)

This email or its attachments might contain communications between attorney and client, communications that are part of the agency deliberative process, or attorney-work product, all of which are privileged and not subject to disclosure outside the agency or to the public. Please consult with the Office of Chief Counsel before disclosing any information contained in this email.

**From:** DocTracker-OIT [mailto:DocTracker-OIT]

**Sent:** Thursday, October 20, 2016 7:32 PM

**To:** Perel, Erica

**Subject:** Work Folder 1652-NEW Certification of Identity (COI) TSA Form 415; 60DN is currently awaiting your approval



The work folder is currently assigned to you for your approval.

Please click this [link](#) to review the work folder.

---

**NOTE:** This is an automated message. Therefore, please do not reply to this message.

**From:** Bryant, Nathan  
**Sent:** Mon, 14 Mar 2016 14:03:29 +0000  
**To:** Houston, Scott  
**Subject:** IVCC policy proposal

Scott,

[REDACTED] (b)(6)  
I can be available any time before Friday when  
convenient for you and Howard.

Thanks,

Nathan S. Bryant  
Special Legal Assistant to the Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

[REDACTED] (b)(6)

Office: 571-227-[REDACTED] (b)(6)

Mobile: [REDACTED] (b)(6)



**Transportation  
Security  
Administration**

February 28, 2017

**MEMORANDUM FOR:** Lee Kair  
Chief of Mission Support (Acting)  
Transportation Security Administration

**FROM:** Russell Roberts, CIO (Acting) *RR* 2/28/17  
Assistant Administrator  
Office of Information Technology (OIT)

**SUBJECT:** Paperwork Reduction Act (PRA), Information Collection Request (ICR):  
1652-NEW Certification of Identity Form (TSA Form 415)

**Overview:** Effective January 22, 2018, the REAL ID Act will be implemented at airport security screening checkpoints. Starting on that day, TSA will not accept state-issued driver's licenses and other state-issued identification cards from states that are not compliant with REAL ID Act requirements unless DHS has granted the state a temporary extension to achieve compliance. In anticipation of the implementation of the Real ID Act, the Administrator's Office along with the Office of Security Operations (OSO) revised TSA Form 415 to assist travelers who do not have identification cards compliant with the REAL ID Act.

The revised form triggered the requirements of the Paperwork Reduction Act (PRA) and in July 2016, the Office of Information Technology (OIT) began working with a PRA team on a new Information Collection Request (ICR), 1652-NEW Certification of Identity Form (TSA Form 415), to the Office of Management and Budget (OMB). The ICR documents were drafted, including the 60-day notice. On November 8, 2016, the 60-day notice was published in the Federal Register, alerting the public of the intent to do the collection. TSA received unfavorable comments from prior litigants of TSA

(b)(5)

**Issue:**

(b)(5)

**Actions:**

(b)(5)

**Timeline:**

(b)(5)

**From:** Bryant, Nathan  
**Sent:** Wed, 31 Aug 2016 17:01:36 +0000  
**To:** Flory, Gillian; Pilcher, Marc; Houlihan, Kevin G  
**Subject:** Policy on access to IVCC  
**Attachments:** Retention of IVCC for Passenger Following REAL ID Enforcement (signed).pdf,  
TSA Form 415 editable (08.24.2016)(SH)(pcrc edit)(kk).docx

(b) (5)

Thanks,

Nathan S. Bryant  
Special Legal Assistant to the Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)

Office: 571-227 (b)(6)

Mobile: (b)(6)

**JUL 14 2016**

U.S. Department of Homeland Security  
601 South 12th Street  
Arlington, VA 20598



**Transportation  
Security  
Administration**

**ACTION**

**MEMORANDUM FOR:** Peter V. Neffenger  
Administrator

**THROUGH:** Huban A. Gowadia, Ph.D. /s/  
Deputy Administrator

Gary Rasicot /s/  
Chief of Operations

Darby LaJoye /s/  
Acting-Assistant Administrator  
Office of Security Operations

Thomas L. Bush /s/  
Assistant Administrator  
Office of Intelligence and Analysis

**FROM:** Howard Goldman /s/  
Senior Counselor  
Office of the Administrator

**SUBJECT:**

(b)(5)

**Purpose**

When TSA commences initial enforcement of REAL ID at airports on January 22, 2018, it will only accept driver's licenses and identification cards issued by compliant states or states granted an extension by DHS. This Action Memo (b)(5)

(b)(5)

<sup>1</sup> For the purposes of the remainder of this memo, non-compliant states with an extension from DHS are considered to be compliant states.

**From:** Kletzly, Katrina  
**Sent:** Thu, 11 Aug 2016 15:28:19 -0400  
**To:** Tuculescu, Roxana; Kilgariff, Laura; Bryant, Nathan  
**Subject:** proposed weekly

Edits/thoughts welcome!

**REAL ID Act Implementation**

(b)(5)

Katrina Kletzly  
Senior Counsel  
Office of Chief Counsel  
Transportation Security Administration  
412-375-(b)(6) desk)  
(b)(6) cell)

This communication might contain communications between attorney and client, communications that are part of the agency deliberative process, or attorney-work product, all of which are privileged and not subject to disclosure outside the agency or to the public. Please consult with the Office of Chief Counsel before disclosing any information contained in this email.

**From:** Thompson, Mardi <TSA OCC>  
**Sent:** Tue, 23 Feb 2016 09:30:46 -0500  
**To:** Bryant, Nathan  
**Cc:** Kilgarriff, Laura  
**Subject:** RE: Action Memo Re: (b)(5) - AA APPROVAL  
NEEDED

Nathan, I have to run off, will be back midday,

(b)(5)

*Shelby County v. Holder*, 570 U.S. \_\_\_\_ (2013), was cited.

**Mardi Ruth Thompson**

Senior Counsel

Regulations & Security Standards Division

Transportation Security Administration

Department of Homeland Security

Phone: (b)(6)

Internet: (b)(6)

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---

**From:** Bryant, Nathan <TSA OCC>  
**Sent:** Monday, February 22, 2016 5:59 PM  
**To:** Thompson, Mardi <TSA OCC>  
**Cc:** Gaudreau, Laura K. <TSA OCC>  
**Subject:** RE: Action Memo Re: (b)(5) - AA APPROVAL NEEDED

(b)(5)



(b)(5)

Let's try to talk in the morning. Send me your availability. Thanks!

Nathan S. Bryant

Special Legal Assistant to the Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)

Office: 571-227 (b)(6)

Mobile (b)(6)

---

**From:** Thompson, Mardi <TSA OCC>

**Sent:** Monday, February 22, 2016 5:10 PM

**To:** Bryant, Nathan <TSA OCC>

**Cc:** Gaudreau, Laura K. <TSA OCC>

**Subject:** RE: Action Memo Re: (b)(5) - AA APPROVAL NEEDED

Never mind the below, I just got it. Brain slow from reviewing years of email for a FOIA request. I would declare my whole hard drive as responsive and let the FOIA folks sort it out, but that would be really mean to Roxana.

(b)(5)

**Mardi Ruth Thompson**

Senior Counsel

Regulations & Security Standards Division

Transportation Security Administration

Department of Homeland Security

Phone: (b)(6)

Internet: (b)(6)

**ATTORNEY-CLIENT PRIVILEGED/ATTORNEY WORK PRODUCT**

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---

**From:** Thompson, Mardi <TSA OCC>

**Sent:** Monday, February 22, 2016 5:01 PM

**To:** Bryant, Nathan <TSA OCC>

**Cc:** Gaudreau, Laura K. <TSA OCC>

**Subject:** RE: Action Memo Re: (b)(5) AA APPROVAL NEEDED

(b)(5)

(b)(5)

Would Mary Kate know?

**Mardi Ruth Thompson**

Senior Counsel

Regulations & Security Standards Division

Transportation Security Administration

Department of Homeland Security

Phone: (b)(6)

Internet: (b)(6)

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---

**From:** Bryant, Nathan <TSA OCC>

**Sent:** Monday, February 22, 2016 4:58 PM

**To:** Thompson, Mardi <TSA OCC>

**Cc:** Gaudreau, Laura K. <TSA OCC>

**Subject:** RE: Action Memo Re: (b)(5) - AA APPROVAL NEEDED

I'm just starting in earnest today. I thought

(b)(5)

Maybe we could have a quick call this

evening or tomorrow am?

Nathan S. Bryant

Special Legal Assistant to the Chief Counsel

Transportation Security Administration

U.S. Department of Homeland Security

(b)(6)

Office: 571-2271 (b)(6)

Mobile: (b)(6)

---

**From:** Thompson, Mardi <TSA OCC>

**Sent:** Monday, February 22, 2016 4:22 PM

**To:** Bryant, Nathan <TSA OCC>

**Cc:** Gaudreau, Laura K. <TSA OCC>

**Subject:** RE: Action Memo Re (b)(5) - AA APPROVAL NEEDED

Nathan, what is the status on the IVCC memo? is there anything Luran and/or I can do to assist? Thanks.

**Mardi Ruth Thompson**

Senior Counsel

Regulations & Security Standards Division

Transportation Security Administration

Department of Homeland Security

Phone: (b)(6)

Internet: (b)(6)

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---

**From:** Houston, Scott

**Sent:** Monday, February 22, 2016 4:21 PM

**To:** Thompson, Mardi <TSA OCC>

**Cc:** Gaudreau, Laura K. <TSA OCC>

**Subject:** RE: Action Memo Re (b)(5) - AA APPROVAL NEEDED

Mardi,

I'm just following up on the status of the memo. (b)(5)

(b)(5) Please let me know if you need any assistance or additional info.

Scott Houston

Senior Liaison to DHS S&T

Office of Security Policy and Industry Engagement

Transportation Security Administration

(b)(6)

S&T Desk: 202.254 (b)(6)

S&T Cell: (b)(6)

TSA Desk: 571.227 (b)(6)

TSA Cell: (b)(6)

---

**From:** Houston, Scott

**Sent:** Thursday, February 11, 2016 1:28 PM

**To:** Bryant, Nathan <TSA OCC>; Flory, Gillian <TSA OCC>; Thompson, Mardi <TSA OCC>

**Cc:** Goldman, Howard <TSA Exec Ofc>

**Subject:** FW: Action Memo Re [REDACTED] b1/5 – AA APPROVAL NEEDED

Mardi, Gillian, Nathan,

[REDACTED] (b)(5)

If you have any questions about the documents (they are not necessarily self-explanatory) please feel free to reach out.

<< File: Copy of Real ID IVCC Scenario.pdf >> << File: Real ID Impact Analysis 2015\_11\_9 (2).pdf >>

<< File: REAL ID Q+A - 01 04 16 - Final.docx >> << File: REAL ID Airport Enforcement Timetable Announcement - Memo for NSC.docx >> << File: Attachment B - IVCC Overview (02.01.2016).docx >>

Scott Houston  
Senior Liaison to DHS S&T  
Office of Security Policy and Industry Engagement  
Transportation Security Administration

[REDACTED] (b)(6)

S&T Desk: 202.254. [REDACTED] (b)(6)

S&T Cell: [REDACTED] (b)(6)

TSA Desk: 571.227 [REDACTED] (b)(6)

TSA Cell: [REDACTED] (b)(6)

---

**From:** John, Libby Ann  
**Sent:** Wednesday, February 10, 2016 4:10 PM  
**To:** Goldman, Howard <TSA Exec Ofc>; Houston, Scott  
**Subject:** RE: Action Memo Re: [REDACTED] (b) (5) - AA APPROVAL NEEDED

Courtney Smith from OCC gave me a call and requested an extension until Friday or Tuesday. She said it was very complicated with a lot of people involved, and everyone is slammed.

Libby Ann John  
Cross Modal Division – National Plans  
Office of Security Policy and Industry Engagement  
Department of Homeland Security/TSA  
571-227-[REDACTED] (b) (6) [REDACTED] (b) (6)

[REDACTED] (b) (6) HSDN: [REDACTED] (b) (6) JWICS: [REDACTED] (b) (6)

Warning: Dates on calendar are closer than they appear.

---

**From:** Goldman, Howard <TSA Exec Ofc>  
**Sent:** Wednesday, February 10, 2016 2:53 PM  
**To:** John, Libby Ann; Houston, Scott  
**Subject:** RE: Action Memo Re: [REDACTED] (b) (5) - AA APPROVAL NEEDED

Yes, Exec Sec handles the folder once the preliminaries are over with.

Howard

Howard Goldman  
Senior Counselor  
Office of the Administrator  
Transportation Security Administration  
571-227-[REDACTED] (b) (6) D)  
[REDACTED] (b) (6) C)

---

**From:** John, Libby Ann  
**Sent:** Wednesday, February 10, 2016 2:49 PM  
**To:** Goldman, Howard <TSA Exec Ofc>; Houston, Scott  
**Subject:** RE: Action Memo Re: [REDACTED] (b) (5) - AA APPROVAL NEEDED

After it clears, we would use Exec Sec to send it to the Administrator, correct? If so, I was going to ask someone down there how to do that since the memo was written by someone in the Front Office.

Libby Ann John

Cross Modal Division – National Plans

Office of Security Policy and Industry Engagement

Department of Homeland Security/TSA

571-227- (b)(6) (b)(6)

(b)(6) HSDN: (b)(6) JWICS: (b)(6)

Warning: Dates on calendar are closer than they appear.

---

**From:** Goldman, Howard <TSA Exec Ofc>

**Sent:** Wednesday, February 10, 2016 2:45 PM

**To:** John, Libby Ann; Houston, Scott

**Subject:** RE: Action Memo Re: (b)(6) AA APPROVAL NEEDED

I just wrote to Mark Kroll to see if OIA can clear this more quickly.

Howard

Howard Goldman

Senior Counselor

Office of the Administrator

Transportation Security Administration

571-227- (b)(6) (D)

(b)(6) (C)

---

**From:** John, Libby Ann

**Sent:** Wednesday, February 10, 2016 2:42 PM

**To:** Goldman, Howard <TSA Exec Ofc>; Houston, Scott

**Subject:** RE: Action Memo Re: (b)(6) AA APPROVAL NEEDED

OCC said they sent out a reminder about the tasker. OIA just email me, requesting an extension to next Wednesday, Feb. 17. They said they need time for leadership to clear.

Libby Ann John

Cross Modal Division – National Plans

Office of Security Policy and Industry Engagement  
Department of Homeland Security/TSA

571-227- (b)(6) (b)(6)

(b)(6) | HSDN: (b)(6) | JWICS: (b)(6)

Warning: Dates on calendar are closer than they appear.

---

**From:** John, Libby Ann

**Sent:** Wednesday, February 10, 2016 10:52 AM

**To:** OCC Communications; Cuneo, Ines <TSA OCC>; TSA OIA ExecSec

**Cc:** Goldman, Howard <TSA Exec Ofc>; Houston, Scott

**Subject:** FW: Action Memo Re: (b)(5) - AA APPROVAL NEEDED

Good morning,

Just a reminder that the action memo (below) is due today. Please let us know if you have any questions or concerns. Thanks!

Libby John

---

**From:** John, Libby Ann

**Sent:** Wednesday, February 03, 2016 4:23 PM

**To:** Regan, Tom; Peiken, Jonathan; Santana, Ray; Buschman, Michele <TSA OCC>

**Cc:** Vogt, Ashley; Kroll, Mark R.; Lopez, Aurelio; Perez1, David; Goldman, Howard <TSA Exec Ofc>; Houston, Scott

**Subject:** Action Memo Re: (b)(5) AA APPROVAL NEEDED

Good afternoon OSO, OIA, OCC and CRL-OE,

Attached is an action memo asking the Administrator (b)(5)

(b)(5) The action memo, written by Senior Counselor Howard Goldman, requires AA-level approval before it is submitted to the Front Office and Administrator Neffenger.

Please review and send any comments or edits by Wednesday, Feb. 10. Please let us know if you have any questions. Thank you!

<< File: (b)(5)

(b)(5)



Libby Ann John  
Cross Modal Division – National Plans  
Office of Security Policy and Industry Engagement  
Department of Homeland Security/TSA  
571-227- (b)(6) (b)(6)

(b)(6) | HSDN: (b)(6) | JWICS: (b)(6)

Warning: Dates on calendar are closer than they appear.

**From:** Thompson, Mardi <TSA OCC>  
**Sent:** Thu, 11 Feb 2016 09:41:36 -0500  
**To:** Houlihan, Kevin G; Flory, Gillian <TSA OCC>; Prosnitz, Susan; Kilgarriff, Laura; Whalen, MaryKate; Bryant, Nathan; Byrne, Eileen  
**Subject:** RE: Action Memo Re (b)(5) – additional information  
**Attachments:** REAL ID Airport Enforcement Timetable Announcement - Memo for NSC.docx

Scott sent me the attached paper, that

It includes

(b)(5)

**Mardi Ruth Thompson**

Senior Counsel

Regulations & Security Standards Division

Transportation Security Administration

Department of Homeland Security

Phone: 202-365- (b)(5)

Internet: (b)(5)

**ATTORNEY-CLIENT PRIVILEGED/ATTORNEY WORK PRODUCT**

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**From:** Bryant, Nathan  
**Sent:** Tue, 16 May 2017 19:13:23 +0000  
**To:** Houston, Scott  
**Cc:** Prosnitz, Susan;Thompson, Mardi;Kilgarrieff, Laura;Kletzly, Katrina;Wheaton, Kelly  
**Subject:** RE (b)(5) TSA Form 415

Thanks. At the next AA level meeting/

(b)(5)

Nathan S. Bryant  
Attorney-Advisor, Federal Court Litigation  
Office of Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)

Office: 571-227- (b)(6)

Mobile: (b)(6)

**From:** Houston, Scott  
**Sent:** Tuesday, May 16, 2017 3:09 PM  
**To:** Bryant, Nathan (b)(6)  
**Cc:** Prosnitz, Susan (b)(6); Thompson, Mardi (b)(6)  
Gaudreau, Laura (b)(6); Kletzly, Katrina (b)(6)  
Wheaton, Kelly (b)(6)  
**Subject:** RE (b)(5) TSA Form 415

Thanks Nathan.

(b)(5)

**From:** Bryant, Nathan  
**Sent:** Tuesday, May 16, 2017 2:47 PM  
**To:** Houston, Scott (b)(6)  
**Cc:** Prosnitz, Susan (b)(6); Thompson, Mardi (b)(6)  
Gaudreau, Laura (b)(6); Kletzly, Katrina (b)(6)  
Wheaton, Kelly (b)(6)  
**Subject:** RE (b)(5) TSA Form 415

Scott,

I attached a tracked changes version of the TSA Form 415. Please let us know when this change is approved.

Thank you,

Nathan S. Bryant  
Attorney-Advisor, Federal Court Litigation  
Office of Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)  
Office: 571-227- (b)(6)  
Mobile: (b)(6)

---

**From:** Bryant, Nathan  
**Sent:** Thursday, May 11, 2017 6:23 PM  
**To:** Houston, Scott <Scott.Houston@tsa.dhs.gov>  
**Cc:** Prosnitz, Susan <Susan.Prosnitz@tsa.dhs.gov>; Thompson, Mardi <Mardi.Thompson@tsa.dhs.gov>;  
Gaudreau, Laura <Laura.Gaudreau@tsa.dhs.gov>; Kletzly, Katrina <Katrina.Kletzly@tsa.dhs.gov>;  
Wheaton, Kelly <Kelly.Wheaton@tsa.dhs.gov>  
**Subject:** (b)(5) TSA Form 415

Scott,

I have attached what I think is the most current draft of the new TSA Form 415. Please let me know if there is a more recent draft.

As discussed, (b)(5) the rest of the document looks good from OCC's perspective (Katrina, et al., correct me if I am wrong).

(b)(5)

(b)(5)

(b)(5)

Thanks,

Nathan S. Bryant  
Attorney-Advisor, Federal Court Litigation  
Office of Chief Counsel  
Transportation Security Administration  
U.S. Department of Homeland Security

(b)(6)

Office: 571-227-

(b)(6)

Mobile

(b)(6)

**From:** Gaudreau, Laura  
**Sent:** Wed, 10 Aug 2016 21:38:29 +0000  
**To:** Tuculescu, Roxana;Kletzly, Katrina;Goldman, Howard;Houston, Scott;Clunie, Peter;Bryant, Nathan;Conley, Melissa  
**Cc:** Michell, Ashlee;John, Libby;Cossairt, Tim;Thompson, Mardi  
**Subject:** RE: IVCC Form  
**Attachments:** TSA Form 415 editable (SH edits 07.28.2016) (NSB)(KEK)(RMT 2)+Mardi.docx

All:

I have attached an updated version that includes Mardi's comments.

Thank you,

**Laura Gaudreau**  
Attorney Advisor  
Office of Chief Counsel – Regulations and Security Standards  
Transportation Security Administration  
Tel: 571 227- (b)(6) Mobile: (b)(6)

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**From:** Tuculescu, Roxana  
**Sent:** Tuesday, August 09, 2016 1:20 PM  
**To:** Kletzly, Katrina; Goldman, Howard; Houston, Scott; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa  
**Cc:** Michell, Ashlee; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

All:

(b)(6)

Please let us know of any questions or comments.

Regards,  
Roxana

Roxana M. Tuculescu  
Attorney-Advisor  
Office of Chief Counsel  
Transportation Security Administration  
Department of Homeland Security  
(571) 227-(b)(6)

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**From:** Tuculescu, Roxana  
**Sent:** Tuesday, August 09, 2016 9:19 AM  
**To:** Kletzly, Katrina; Goldman, Howard; Houston, Scott; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa  
**Cc:** Michell, Ashlee; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

Looking back (b)(5) but I am happy to try to correct it. I will send out a revised version shortly.

Regards,  
Roxana

Roxana M. Tuculescu  
Attorney-Advisor  
Office of Chief Counsel  
Transportation Security Administration  
Department of Homeland Security  
(571) 227-(b)(6)

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**From:** Kletzly, Katrina  
**Sent:** Monday, August 08, 2016 4:16 PM  
**To:** Goldman, Howard; Houston, Scott; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa

**Cc:** Michell, Ashlee; John, Libby; Cossairt, Tim; Tuculescu, Roxana  
**Subject:** RE: IVCC Form

It looks like Roxana (or maybe Nathan), who I inadvertently left off when I sent the email originally, might have made that edit, so we can try to address the formatting issue for you tomorrow when she's back in the office. I'm sorry about that!

---

**From:** Goldman, Howard  
**Sent:** Monday, August 08, 2016 4:11 PM  
**To:** Kletzly, Katrina; Houston, Scott; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa  
**Cc:** Michell, Ashlee; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

It may be a formatting issue. When I open it up in the "Final Showing Markup" view it is NOT there, I kid you not. When I switch to "Final" view it is there. I thought it was perhaps because I blew up the viewing screen so my bad eyes could see better, but when I shrink it down it still doesn't appear in the markup version. I can't explain it but I can see it in "Final".

Howard

Howard Goldman  
Senior Counselor  
Office of the Administrator  
Transportation Security Administration  
571-227-(b)(6) (D)  
(b)(6) (C)

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**From:** Kletzly, Katrina  
**Sent:** Monday, August 08, 2016 4:05 PM  
**To:** Houston, Scott; Goldman, Howard; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa  
**Cc:** Michell, Ashlee; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

That is odd. I just opened it again and I see it. I'm reattaching in case was there a glitch with how it was sent before.

---

**From:** Houston, Scott  
**Sent:** Monday, August 08, 2016 3:59 PM  
**To:** Goldman, Howard; Kletzly, Katrina; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa  
**Cc:** Michell, Ashlee; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

It's actually pretty strange. (b)(5) is there when I open it, but doesn't appear when Howard opens the same document.



---

**From:** Goldman, Howard  
**Sent:** Monday, August 08, 2016 3:50 PM  
**To:** Kletzly, Katrina; Houston, Scott; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa  
**Cc:** Michell, Ashlee; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

Bizarrely, it's not in the version on my screen that I opened. Scott was looking over my shoulder to verify that I am not making this up! He has it on some version. I can't explain that.

Howard

Howard Goldman  
Senior Counselor  
Office of the Administrator  
Transportation Security Administration

571-227- (b)(6) (D)

(b)(6) (C)

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**From:** Kletzly, Katrina  
**Sent:** Monday, August 08, 2016 3:16 PM  
**To:** Goldman, Howard; Houston, Scott; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa  
**Cc:** Michell, Ashlee; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

(b)(5)

Katrina Kletzly  
Senior Counsel  
Office of Chief Counsel  
Transportation Security Administration

412-375- (b)(6) desk)

(b)(6) cell)

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**From:** Goldman, Howard  
**Sent:** Monday, August 08, 2016 3:08 PM  
**To:** Kletzly, Katrina; Houston, Scott; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa  
**Cc:** Michell, Ashlee; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

Where

(b)(5)

Howard

Howard Goldman  
Senior Counselor  
Office of the Administrator  
Transportation Security Administration  
571-227- (b)(6) (D)  
(b)(6) (C)

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**From:** Kletzly, Katrina  
**Sent:** Monday, August 08, 2016 2:22 PM  
**To:** Houston, Scott; Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa  
**Cc:** Michell, Ashlee; Goldman, Howard; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

Scott,  
Attached are edits thus far from Nathan, Roxana, and I. Happy to discuss further if need be.

Katrina

Katrina Kletzly  
Senior Counsel  
Office of Chief Counsel  
Transportation Security Administration  
412-375- (b)(6) desk)  
(b)(6) cell)

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**From:** Houston, Scott  
**Sent:** Monday, August 08, 2016 1:01 PM  
**To:** Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa; Kletzly, Katrina  
**Cc:** Michell, Ashlee; Goldman, Howard; John, Libby; Cossairt, Tim  
**Subject:** RE: IVCC Form

All, I'm adding Tim Cossairt and re-sending the IVCC form for comments and feedback.

-Scott

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**From:** Houston, Scott  
**Sent:** Thursday, July 28, 2016 2:24 PM  
**To:** Clunie, Peter; Bryant, Nathan; Gaudreau, Laura; Conley, Melissa; Kletzly, Katrina  
**Cc:** Michell, Ashlee; Goldman, Howard <TSA Exec Ofc>; John, Libby  
**Subject:** IVCC Form

I took a first crack at updating the IVCC form and then sat down with Peter today. Please send me your suggestions, edits and changes.

Scott Houston  
Senior Liaison to DHS S&T  
Office of Security Policy and Industry Engagement  
Transportation Security Administration

(b)(6)  
S&T Desk: 202.254 (b)(6)  
S&T Cell: (b)(6)  
TSA Desk: 571.227 (b)(6)  
TSA Cell: (b)(6)

**From:** Gaudreau, Laura  
**Sent:** Tue, 16 Jan 2018 17:34:31 +0000  
**To:** Kletzly, Katrina; Bryant, Nathan  
**Cc:** Klemm, Traci  
**Subject:** RE: IVCC PRA- Close Out?

I just got off a call with DHS Policy/

(b)(5)

Can you both talk this afternoon to touch base?

**Laura Gaudreau**  
Attorney Advisor  
Office of Chief Counsel – Regulations and Security Standards  
Transportation Security Administration  
Tel: 571 227- (b)(6) Mobile: (b)(6)

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**From:** Kletzly, Katrina  
**Sent:** Tuesday, January 16, 2018 10:32 AM  
**To:** Gaudreau, Laura <Laura.Gaudreau@tsa.dhs.gov>; Bryant, Nathan <Nathan.Bryant@tsa.dhs.gov>  
**Cc:** Klemm, Traci <Traci.Klemm@tsa.dhs.gov>  
**Subject:** RE: IVCC PRA- Close Out?

(b)(5)

Katrina Kletzly  
Senior Counsel  
Office of Chief Counsel  
Transportation Security Administration  
412-375- (b)(6) desk)